

Office of the Chapter 13 Standing Trustee

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January 8, 2015

The Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

**RE: CHAPTER 13 BANKRUPTCY
CASE NO. 14-29177 (JNP)
DEBTORS: Amalia Mejias**

Dear Judge Poslusny:

Please accept this letter as a limited objection to Debtors' Notice of Private Sale which is returnable April 30, 2019.

Debtor is seeking to sell real estate located at 926 N. 7th Street, Camden, New Jersey in the amount of \$40,000.00.

Debtor has failed to provide a copy of the contract of sale with the Notice. It does not appear that the property was ever marketed for sale and there was no realtor involved in the sale of property. The Trustee cannot ascertain if better and higher offers could have been obtained.

Debtor's schedule A reports a secured claim of \$12,484.97. Debtor is 1/6 owner of the property. Debtor claimed \$2,200.00 exemption on schedule C. However, a liquidation analysis reveals that after closing costs, proceeds will total approximately \$3,800.00, which can be applied to Debtor's plan as a base to unsecured creditors.

Sale - \$40,000.00
COS - \$4,000.00
1/6 - \$6,000.00
Exemption - \$2,200.00
Net Proceeds - \$3,800.00

Based on the foregoing, the Trustee respectfully requests Debtor provide to the Trustee a Contract of Sale with terms of the transaction. Additionally, it is respectfully requested Debtor be required to file a motion to approve the sale, with a proposed form of Order providing that non-exempt proceeds will be forwarded to the Trustee as an additional base to unsecured creditors.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully Submitted,

***OFFICE OF THE CHAPTER 13
STANDING TRUSTEE***

/s/ Raymond H. Shockley, Jr.
Raymond H. Shockley, Jr.
Staff Attorney

RHS/kt

cc: Mark W. Ford, Esquire (Via CM/ECF and e-mail)
Amalia Mejias (Via First Class Mail)